

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Dragon, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 637-2345; Fax: (702) 946-1345
9 dbrenner@wrightlegal.net
10 ldragon@wrightlegal.net

11 *Attorneys for Plaintiff, The Bank of New York Mellon, f/k/a The Bank of New York, as Trustee for*
12 *the Certificateholders of the CWALT, Inc., Alternative Loan Trust 2006-OA2 Mortgage Pass-*
13 *Through Certificates, Series 2006-OA2*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 THE BANK OF NEW YORK MELLON,
12 F/K/A THE BANK OF NEW YORK, AS
13 TRUSTEE FOR THE CERTIFICATE-
14 HOLDERS OF THE CWALT, INC.,
15 ALTERNATIVE LOAN TRUST 2006-OA2
16 MORTGAGE PASS-THROUGH
17 CERTIFICATES, SERIES 2006-OA2,

18 Plaintiff,

19 vs.

20 NORTH AMERICAN TITLE INSURANCE
21 COMPANY, DOE INDIVIDUALS I through
22 X; and ROE CORPORATIONS XI through
23 XX, inclusive,

24 Defendants.

Case No.: 2:21-cv-00395-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE A
PROPOSED DISCOVERY PLAN**

(First Request)

25 Plaintiff, The Bank of New York Mellon, f/k/a The Bank of New York, as Trustee for the
26 Certificateholders of the CWALT, Inc., Alternative Loan Trust 2006-OA2 Mortgage Pass-
27 Through Certificates, Series 2006-OA2 (“BONY”) and Defendant, North American Title
28 Insurance Company (“NATIC”), by and through their undersigned counsel, stipulate and agree
as follows:

1. On March 8, 2021, BONY filed its Complaint in Eighth Judicial District Court, Case No. A-21-830741-C [ECF No. 1-1];

2. On March 10, 2021, NATIC filed a Petition for Removal to this Court [ECF No. 1];
3. On April 5, 2021, the Parties entered into a Stipulation to Stay Case and advised the Court the Parties saw potential for settling this matter and agreed to file a status report in ninety (90) days [ECF No. 7];
4. On July 6, 2021, the Parties filed a Joint Status Report advising the Court of the ongoing settlement discussions and requesting an additional sixty (60) days to pursue settlement [ECF No. 10];
5. On April 28, 2022, this Court issued a Minute Order requesting that the Parties file a status report or stipulation to continue the stay by May 5, 2022 [ECF No. 11];
6. On May 6, 2022, the Court ordered that the stay of the instant action shall be extended while the parties discuss potential settlement [ECF No. 14]. The Parties were ordered to file a Joint Status Report ninety (90) days after entry of the order. *Id.*;
7. On August 4, 2022, the Parties filed a Joint Status Report advising the Court of the ongoing settlement discussions and requesting an additional ninety (90) days to pursue settlement [ECF No. 15];
8. On November 2, 2022, the Parties filed a Joint Status Report advising the Court that the Parties attended a private mediation on September 29, 2022, which did not result in settlement. The Parties requested thirty (30) days to submit their proposed discovery plan [ECF No. 16];
9. BONY's counsel is currently preparing for an oral argument therefore, the Parties are requesting an additional thirty-two (32) days, through and including January 3, 2023, to file their proposed discovery plan;
10. Counsel for NATIC does not oppose the requested extension;

///

///

///

///

///

11. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 1st day of December, 2022.

DATED this 1st day of December, 2022.

WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

/s/ Lindsay D. Dragon, Esq.

/s/ Kevin S. Sinclair, Esq.

Lindsay D. Dragon, Esq.

Kevin S. Sinclair, Esq.

Nevada Bar No. 13474

Nevada Bar No. 12277

7785 W. Sahara Ave., Suite 200

16501 Ventura Blvd, Suite 400

Las Vegas, Nevada 89117

Encino, California 91436

Attorneys for Plaintiff, The Bank of New York Mellon, f/k/a The Bank of New York, as

Attorneys for Defendant, North American Title Insurance Company

Trustee for the Certificateholders of the CWALT, Inc., Alternative Loan Trust 2006-

OA2 Mortgage Pass-Through Certificates,

Series 2006-OA2

IT IS SO ORDERED.

Dated this 2nd day of December, 2022.



UNITED STATES DISTRICT COURT JUDGE